

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
Revision of Part 15 of the)
Commission's Rules Regarding)
Ultra-Wideband Transmission)
Systems)

ET Docket No. 98-153

Response to Multispectral Solutions, Inc.
FCC filing dated August 31, 2001

This submission refers to the filing of Multispectral Solutions, Inc. (MSSI) dated August 31, 2001.

I dislike being placed in a position of having to correct the statements of an obviously intelligent person, who continues to overlook that part of the UWB community called GPR (Ground Penetrating Radar). Geophysical Survey Systems, Inc. has been in the GPR business for over 30 years.

The MSSI filing declares; "We stated to the Commissioner that, without exception, *all* UWB proponents have demonstrated the ability to filter their transmissions and that, given the vast amount of data demonstrating UWB interference below 3.1 GHz, such a restriction would be a "win-win" for both the UWB industry and existing wireless users."

With regard to the GPR community, this statement is blatantly false. We were never consulted by MSSI regarding this statement nor contacted by them at any time. Secondly, GPR pulse radars operate with pulses in the time domain, and they cannot be filtered without destroying their functionality. Virtually all of our energy is below 3.1 GHz. This is required to have any significant penetration into the ground.

We are not in agreement with MSSI's sweeping generalizations. We, and others, have already submitted a plethora of data concerning the operation and value of GPR systems. We will not add any more here. We object strongly to the distribution of incorrect information.

Dennis J. Johnson
President
Geophysical Survey Systems, Inc.